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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ORACLE USA, INC.; a Colorado corporation; ORACLE AMERICA, INC.; a Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation; and SETH RAVIN, an individual,

Defendants.

CASE NO. 2:10-cv-0106-LRH-VCF

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO  
WITHDRAW ORACLE’S MOTION  
FOR ATTORNEYS’ FEES AND  
COSTS FOR ENFORCING THE  
INJUNCTION**

Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp. (together, “Oracle”) and Defendants Rimini Street, Inc. and Seth Ravin (“Rimini”) (collectively, “Parties”) jointly submit this Stipulation and [Proposed] Order.

WHEREAS, on October 25, 2023, the Court held that it would “assess and impose reasonable attorneys’ fees and costs in favor Oracle through appeal and judgment.” ECF No. 1588;

WHEREAS, on November 27, 2023, Oracle filed a Motion for Attorneys’ Fees and Costs for Enforcing the Injunction (“Oracle’s Motion”), seeking \$10,485,695.42 in fees and \$1,692,795.95 in costs incurred from November 6, 2018, through September 30, 2023, and estimated it would supplement its motion with approximately \$135,000 in fees incurred from October and November 2023. ECF No. 1591;

WHEREAS, the Parties have agreed to a resolution of Oracle’s Motion upon Rimini’s payment of \$9,742,793.10 to Oracle no later than December 8, 2023;

WHEREAS, the Parties agree that the Motion is now moot and should be withdrawn;

WHEREAS, the Parties also agree that Rimini shall not further appeal or petition for a writ of certiorari concerning this Court’s findings of contempt [ECF No. 1548] or the Ninth Circuit’s associated decision on appeal;

1           THEREFORE, the Parties stipulate and request that the Court consider the Motion  
2 withdrawn without prejudice to Oracle's right to renew the Motion in the event of Rimini's  
3 non-performance.

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5       Dated: December 6, 2023

6       MORGAN, LEWIS & BOCKIUS LLP

7  
8       By: /s/ Benjamin P. Smith  
          Benjamin P. Smith

9       *Attorneys for Plaintiffs Oracle USA, Inc.,*  
10      *Oracle America, Inc., and Oracle*  
11      *International Corporation*

          Dated: December 6, 2023

          GIBSON, DUNN & CRUTCHER LLP

          By: /s/ Eric D. Vandavelde  
              Eric D. Vandavelde

*Attorneys for Defendants Rimini Street, Inc.,*  
          *and Seth Ravin*

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14                                   **IT IS SO ORDERED:**

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17                                   \_\_\_\_\_  
18                                   Hon. Larry R. Hicks  
                                      United States District Judge

19                                   Dated: December\_\_\_\_, 2023  
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**ATTESTATION OF FILER**

The signatories to this document are Eric D. Vandavelde and me, and I have obtained his concurrence to file this document on his behalf.

Dated: December 6, 2023

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Benjamin P. Smith  
Benjamin P. Smith

*Attorneys for Plaintiffs Oracle USA, Inc., Oracle  
America, Inc., and Oracle International  
Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I caused to be electronically uploaded a true and correct copy in Adobe “pdf” format of the above document to the United States District Court’s Case Management and Electronic Case Filing (CM/ECF) system. After the electronic filing of a document, service is deemed complete upon transmission of the Notice of Electronic Filing (“NEF”) to the registered CM/ECF users. All counsel of record are registered users.

DATED: December 6, 2023

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Benjamin P. Smith  
Benjamin P. Smith

*Attorneys for Plaintiffs Oracle USA, Inc., Oracle  
America, Inc., and Oracle International  
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